

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<p>(1) LADON E. HILL,</p>	<p>)</p>	
	<p>)</p>	
<p>Plaintiff,</p>	<p>)</p>	
	<p>)</p>	Case No. 17-cv-00227-CVE-mjx
	<p>)</p>	
	<p>)</p>	Removed from Tulsa
	<p>)</p>	County
	<p>)</p>	Case No. CJ-2017-510
<p>(1) MEMORIAL DRIVE UNITED METHODIST CHURCH, a not-for-profit Religious organization</p>	<p>)</p>	
	<p>)</p>	JURY TRIAL DEMANDED
	<p>)</p>	
	<p>)</p>	
<p>Defendant.</p>	<p>)</p>	
	<p>)</p>	
	<p>)</p>	

NOTICE OF REMOVAL

COMES NOW the Defendant, Memorial Drive United Methodist Church, pursuant to 28 U.S.C. § 1441 *et seq.*, and hereby files this Notice of Removal of the action styled *Ladon E. Hill, Plaintiff, v. Memorial Drive United Methodist Church, a not-for-profit Religious organization, Defendant*, Case No. CJ-2017-510, District Court of Tulsa County, State of Oklahoma. Defendant submits that this Court has jurisdiction over federal questions raised in Plaintiff’s Petition pursuant to 28 U.S.C. § 1331. In further support, Defendant would state as follows:

1. On October 23, 2013, Plaintiff commenced a civil action in the District Court of Tulsa County, State of Oklahoma, Case No. CJ-2013-4869, and styled *Ladon E. Hill v. Memorial Drive United Methodist Church*.
2. Plaintiff’s Petition set forth federal claims pursuant to 42 U.S.C. § 1981 and Title VII of the Civil Rights Act of 1964.
3. On November 15, 2013, Defendant submitted a Notice of Removal to the United States

- District Court for the Northern District of Oklahoma, removing said action to federal court.
4. On June 6, 2014, Plaintiff and Defendant submitted a Joint Stipulation of Dismissal, voluntarily terminating said action.
 5. On February 9, 2017, Plaintiff refiled this action in the District Court of Tulsa County, State of Oklahoma, Case No. CJ-2017-510.
 6. Plaintiff's Petition in the present action sets forth federal claims pursuant to 42 U.S.C. § 1981.
 7. Defendant files this Notice of Removal within thirty (30) days after the receipt by Defendant of papers from which it was first ascertainable that the case is one that is removable.
 8. The United States District Court for the Northern District of Oklahoma is the federal judicial district embracing the District Court of Tulsa County, State of Oklahoma, where this suit was originally filed. Venue is therefore proper under 28 U.S.C. §§ 116(c) and 1441(a).
 9. Pursuant to 28 U.S.C. § 1446(a) and Local Rule 81.2 of the United States District Court for the Northern District of Oklahoma, clearly legible copies of all documents filed or served in this case, along with a copy of the docket sheet, have been attached hereto as Exhibits 1 through 3, respectively.
 10. This Notice of Removal is signed pursuant to FRCP 11, in accordance with 28 U.S.C. § 1446(a).
 11. Contemporaneous with the filing of this Notice of Removal, Defendant is providing written notice of filing to Plaintiff and will file a copy of this Notice of Removal with the District Court of Tulsa County, State of Oklahoma.

WHEREFORE, Defendant respectfully submits that this Court has original jurisdiction on the basis of federal question jurisdiction, and through compliance with all applicable requirements for removal, has properly effectuated the removal of this civil action from the District Court of Tulsa County, State of Oklahoma, to the United States District Court for the Northern District of Oklahoma.

Respectfully submitted,

BEST & SHARP

s/Travis J. Kirk

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Attorneys for Defendant, Memorial

United Methodist Church Drive

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April, 2017, I mailed the above and foregoing instrument by First Class United States Mail, postage prepaid, to:

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Attorneys for Plaintiff

s/Travis J. Kirk